

**EXHIBIT 12**  
**FILED UNDER SEAL**

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Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

THE STATE OF TEXAS, et al., )  
)  
Plaintiffs, )  
)  
v. ) CIVIL ACTION  
) NO. 4:20-cv-00957-SDJ  
GOOGLE LLC, )  
)  
Defendant. )  
\_\_\_\_\_ )

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VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF  
LUCAS TUCKER, SENIOR ASSISTANT ATTORNEY GENERAL  
LAS VEGAS, NEVADA  
MONDAY, APRIL 29, 2024

Kele R. Smith, NV CCR No. 672, CA CSR No. 13405  
Job No. 6657786

Job No. CS6657786

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1 VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF  
2 LUCAS TUCKER, SENIOR ASSISTANT ATTORNEY GENERAL,  
3 taken from Las Vegas, Nevada, on Monday, April 29, 2024,  
4 at 8:32 a.m. before Kele R. Smith, Certified Court  
5 Reporter, in and for the State of Nevada.  
6

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## I N D E X

WITNESS: LUCAS TUCKER, SENIOR ASSISTANT ATTORNEY  
GENERAL

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1 BY MR. ZHANG:

2 Q. But sitting here now, you're not aware of any  
3 Nevada-specific facts underlying the Fourth Amended  
4 Complaint in this case. Correct?

5 MR. HENTHORN: Objection. Form. Asked and  
6 answered.

7 A. You know, I'm going refer to, you know, the  
8 common facts as described by Mr. Gordon for the State of  
9 Texas, and again, it is a national market and we're not  
10 aware of anything that differentiates the harm in Nevada  
11 from the harm across the nation.

12 BY MR. ZHANG:

13 Q. Did Nevada AGO put in place any document hold in  
14 connection with this case?

15 MR. HENTHORN: Objection. Form.

16 A. Did we put into place document holds? Is that  
17 what you asked?

18 BY MR. ZHANG:

19 Q. Do you know what is a document hold or do you  
20 prefer to call it a litigation hold?

21 A. Okay. Litigation hold, basically I know it's to  
22 preserve documents. No, we did not.

23 Q. So Nevada AGO didn't put in place any litigation  
24 hold in connection with this case. Correct?

25 A. That's correct.

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## 1 CERTIFICATE OF REPORTER

2 STATE OF NEVADA )  
 ) ss:

3 COUNTY OF CLARK )

4 I, KELE R. SMITH, a Certified Court Reporter in  
5 Clark County, State of Nevada, do hereby certify: That  
6 I reported the taking of the deposition of LUCAS TUCKER,  
7 SENIOR ASSISTANT ATTORNEY GENERAL, commencing on Monday,  
8 April 29, 2024, at 8:32 a.m.

9 That prior to being deposed, the witness was by  
10 me duly sworn to testify to the truth, that I thereafter  
11 transcribed my said shorthand notes into typewriting, and  
12 that the typewritten transcript is a complete, true, and  
13 accurate transcription of said shorthand notes and that  
14 the witness was asked to review and correct the  
15 transcript.

16 I further certify that I am not a relative or  
17 employee of counsel of any of the parties, nor a  
18 relative or employee of the parties involved in said  
19 action, nor a person financially interested in the  
20 action.

21 IN WITNESS WHEREOF, I have set my hand in my  
22 office in the County of Clark, State of Nevada, this  
23 30th day of April, 2024.

24 

25 KELE R. SMITH, NV CCR #672, CA CSR #13405